

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT
 BY: ☐ COMPLAINT ☒ INFORMATION ☐ INDICTMENT
☐ SUPERSEDING
OFFENSE CHARGED
 18 U.S.C. § 2243(b) – Sexual Abuse of a Ward;
 18 U.S.C. § 1001 – False Statement to a Government
 Agency

☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

PENALTY: SEE ATTACHMENT TO PENALTY SHEET

Name of District Court, and/or Judge/Magistrate Location

 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION
DEFENDANT - U.S.

▶ ANDREW JONES

 DISTRICT COURT NUMBER
 4:23-cr-00212-HSG
PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

DOJ/OIG and FBI

☐ person is awaiting trial in another Federal or State Court,
 give name of court

☐ this person/proceeding is transferred from another district
 per (circle one) FRCrp 20, 21, or 40. Show District

☐ this is a reprosecution of
 charges previously dismissed
 which were dismissed on motion
 of:

☐ U.S. ATTORNEY ☐ DEFENSE
SHOW
DOCKET NO.
☐ this prosecution relates to a
 pending case involving this same
 defendant
MAGISTRATE
CASE NO.
☐ prior proceedings or appearance(s)
 before U.S. Magistrate regarding this
 defendant were recorded under

 Name and Office of Person
 Furnishing Information on this form ISMAIL J. RAMSEY
☒ U.S. Attorney ☐ Other U.S. Agency
 Name of Assistant U.S.
 Attorney (if assigned) ANDREW PAULSON, AUSA
DEFENDANT**IS NOT IN CUSTODY**
 1) ☒ Has not been arrested, pending outcome this proceeding.
 If not detained give date any prior
 summons was served on above charges ▶
2) ☐ Is a Fugitive3) ☐ Is on Bail or Release from (show District)**IS IN CUSTODY**4) ☐ On this charge5) ☐ On another conviction6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

 Has detainer ☐ Yes
 been filed? ☐ No

 If "Yes"
 give date
 filed

**DATE OF
 ARREST** ▶

Month/Day/Year

Or... if Arresting Agency & Warrant were not

**DATE TRANSFERRED
 TO U.S. CUSTODY** ▶

Month/Day/Year

FILED
 Jul 13 2023
 Mark B. Busby
 CLERK, U.S. DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND

State

☐ This report amends AO 257 previously submitted**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**
☐ SUMMONS ☒ NO PROCESS* ☐ WARRANT

Bail Amount: _____

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

 * Where defendant previously apprehended on complaint, no new summons or
 warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____ Before Judge: _____

Comments:

ATTACHMENT TO PENALTY SHEET - ANDREW JONES

MAXIMUM PENALTIES:

Counts 1-6 (18 U.S.C. § 2243(b) – Sexual Abuse of a Ward)

- 15 years' imprisonment
- \$250,000 fine
- Maximum Supervised Release: Life; Minimum Supervised Release: 5 years
- Restitution
- \$5,100 special assessment

Count 7 (18 U.S.C. § 1001(a)(2) – False Statements to a Government Agency)

- 8 years imprisonment
- \$250,000 fine
- Restitution
- 3 years supervised release

ISMAIL J. RAMSEY (CABN 189820)
United States Attorney

FILED

Jul 13 2023

Mark B. Busby
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 4:23-cr-00212-HSG
Plaintiff,)	
v.)	VIOLATIONS:
)	18 U.S.C. § 2243(b) – Sexual Abuse of a Ward;
ANDREW JONES,)	18 U.S.C. § 1001 – False Statement to a Government
Defendant.)	Agency
)	OAKLAND VENUE

I N F O R M A T I O N

The United States Attorney charges:

Introductory Allegations

1. The Federal Correctional Institution, Dublin (“FCI Dublin”) was a federal prison in Alameda County, California, within the Northern District of California.

2. The defendant ANDREW JONES (“JONES”) was employed at FCI Dublin as a correctional officer.

3. C.V. was a female inmate at FCI Dublin, who was serving a prison sentence.

4. J.L. was a female inmate at FCI Dublin, who was serving a prison sentence.

5. R.C. was a female inmate at FCI Dublin, who was serving a prison sentence.

1 COUNT ONE: (18 U.S.C. § 2243(b) – Sexual Abuse of a Ward)

2 6. Paragraphs 1 through 5 of this Information are re-alleged and incorporated as if fully set
3 forth here.

4 7. On a date between on or about July 1, 2020 and on or about December 31, 2020, in the
5 Northern District of California, the defendant,

6 ANDREW JONES,

7 while in FCI Dublin, a Federal prison, knowingly engaged in a sexual act with C.V., a person who was
8 in official detention and under the custodial, supervisory, and disciplinary authority of the defendant,
9 when he caused contact between his penis and C.V.'s mouth, while they were in a staff bathroom in the
10 FCI Dublin kitchen, in violation of 18 U.S.C. § 2243(b).

11 COUNT TWO: (18 U.S.C. § 2243(b) – Sexual Abuse of a Ward)

12 8. Paragraphs 1 through 5 of this Information are re-alleged and incorporated as if fully set
13 forth here.

14 9. On a date between on or about July 1, 2020 and on or about December 31, 2020, in the
15 Northern District of California, the defendant,

16 ANDREW JONES,

17 while in FCI Dublin, a Federal prison, knowingly engaged in a sexual act with C.V., a person who was
18 in official detention and under the custodial, supervisory, and disciplinary authority of the defendant,
19 when he penetrated C.V.'s vulva with his penis, while they were in a staff bathroom in the FCI Dublin
20 kitchen, in violation of 18 U.S.C. § 2243(b).

21 COUNT THREE: (18 U.S.C. § 2243(b) – Sexual Abuse of a Ward)

22 10. Paragraphs 1 through 5 of this Information are re-alleged and incorporated as if fully set
23 forth here.

24 11. On a date between on or about July 1, 2020 and on or about December 31, 2020, in the
25 Northern District of California, the defendant,

26 ANDREW JONES,

27 while in FCI Dublin, a Federal prison, knowingly engaged in a sexual act with C.V., a person who was
28 in official detention and under the custodial, supervisory, and disciplinary authority of the defendant,

1 when he penetrated C.V.'s vulva with his penis, while they were in the food service warehouse, in
2 violation of 18 U.S.C. § 2243(b).

3 COUNT FOUR: (18 U.S.C. § 2243(b) – Sexual Abuse of a Ward)

4 12. Paragraphs 1 through 5 of this Information are re-alleged and incorporated as if fully set
5 forth here.

6 13. On a date between on or about January 1, 2021 and on or about June 30, 2021, in the
7 Northern District of California, the defendant,

8 ANDREW JONES,

9 while in FCI Dublin, a Federal prison, knowingly engaged in a sexual act with J.L., a person who was in
10 official detention and under the custodial, supervisory, and disciplinary authority of the defendant, when
11 he caused contact between his penis and J.L.'s mouth, while they were in a warehouse near the
12 FCI Dublin kitchen, in violation of 18 U.S.C. § 2243(b).

13 COUNT FIVE: (18 U.S.C. § 2243(b) – Sexual Abuse of a Ward)

14 14. Paragraphs 1 through 5 of this Information are re-alleged and incorporated as if fully set
15 forth here.

16 15. On a date between on or about March 1, 2021 and on or about June 30, 2021, in the
17 Northern District of California, the defendant,

18 ANDREW JONES,

19 while in FCI Dublin, a Federal prison, knowingly engaged in a sexual act with R.C., a person who was
20 in official detention and under the custodial, supervisory, and disciplinary authority of the defendant,
21 when he penetrated R.C.'s vulva with his penis, while they were in a storage room in the officer's office
22 in the FCI Dublin kitchen, in violation of 18 U.S.C. § 2243(b).

23 COUNT SIX: (18 U.S.C. § 2243(b) – Sexual Abuse of a Ward)

24 16. Paragraphs 1 through 5 of this Information are re-alleged and incorporated as if fully set
25 forth here.

26 17. On a date between on or about March 1, 2021 and on or about June 30, 2021, in the
27 Northern District of California, the defendant,

1 ANDREW JONES,

2 while in FCI Dublin, a Federal prison, knowingly engaged in a sexual act with R.C., a person who was
3 in official detention and under the custodial, supervisory, and disciplinary authority of the Defendant,
4 when he penetrated R.C.'s vulva with his penis, while they were in a bathroom near the FCI Dublin
5 kitchen, in violation of 18 U.S.C. § 2243(b).

6 COUNT SEVEN: (18 U.S.C. § 1001(a)(2) – False Statement to Government Agency)

7 18. Paragraphs 1 through 5 of this Information are re-alleged and incorporated as if fully set
8 forth here.

9 19. On or about March 11, 2022, in the Northern District of California, the defendant,

10 ANDREW JONES,

11 did willfully and knowingly make materially false, fictitious, and fraudulent statements and
12 representations in a matter within the jurisdiction of the executive branch of the Government of the
13 United States, by stating that he had never had sexual intercourse with C.V. These statements and
14 representations were false because, as JONES then and there knew, he had engaged in sexual intercourse
15 with C.V.

16 It is further alleged that this offense involved offenses under Chapter 109A.

17 All in violation of Title 18, United States Code, Section 1001(a)(2).

18
19 DATED: July 13, 2023

ISMAIL J. RAMSEY
United States Attorney

21 /s/ Andrew Paulson
22 ANDREW PAULSON
23 MOLLY K. PRIEDEMAN
24 Assistant United States Attorneys
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